

# Nelson Mullins

## Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

151 Meeting Street / Sixth Floor / Charleston, South Carolina 29401-2239

Tel: 843.853.5200 Fax: 843.722.8700

www.nelsonmullins.com

Peter T. Phillips

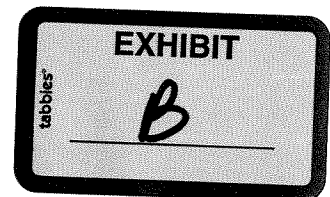
Tel: 843.534.4417

peter.phillips@nelsonmullins.com

March 29, 2006

William Gary White, III, Esq.  
2009 Lincoln Street  
Columbia, South Carolina 29201

RE: Junnie Wider v. Isuzu, et al.  
C/A No.: 05-CP-40-1019  
Our File No.: 00197/02198



Dear Gary:

As the Court indicated to us when granting the continuance in the above-referenced case, we must submit a proposed scheduling order prior to the April 21, 2006 jury term. To that end, I have attached a proposed scheduling order for your review. Because Isuzu was not served until October of last year, we believe these dates provide sufficient time for both parties to properly address this case. If these dates meet with your approval, please execute your signature page and return it to me in the self-addressed envelope for filing with the Court. If you have any questions or concerns regarding these dates, please feel free to contact me so we may discuss and finalize this issue as soon as practicable.

Moreover, we will need to obtain consent from Kathy Williams in order to submit this scheduling order to the Court. We have not seen an appearance by her or counsel on her behalf, and if you know to whom I should forward this proposed order, please let me know as soon as possible. You mentioned to me recently that you may have resolved your case against Ms. Williams, and, if that is the case, please let us know when you expect to file an order or stipulation of dismissal which will render the necessity of obtaining her consent a moot point.

In addition, we served our First Interrogatories and Request for Production on December 27, 2005. After we did not receive any response, I spoke to your office early this month and agreed that these responses would be due on March 17, 2006. To date, we have not received these discovery responses from you. Unless we receive your responses by April 10, 2006, we will be forced to file a motion to compel.

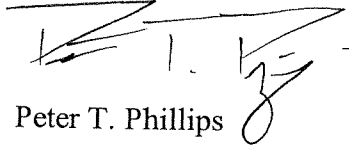
Finally, on March 8, 2006, we agreed to your request to amend the complaint to properly identify Isuzu in the caption. It is my understanding that amended complaint has since been filed;

William Gary White, III, Esq.  
March 29, 2006  
Page 2

however, we have not yet received a copy of the same. Please forward a copy for our files at your earliest convenience.

Thank you for your attention to these matters and I look forward to hearing from you.

Very truly yours,

A handwritten signature in black ink, appearing to read "P. T. Phillips", with a stylized flourish at the end.

Peter T. Phillips

PTP:ptp  
Enclosures

STATE OF SOUTH CAROLINA            )  
  ) IN THE COURT OF COMMON PLEAS  
COUNTY OF RICHLAND                ) FIFTH JUDICIAL CIRCUIT

Junnie Mae Wider, ) Civil Action No. 2005-CP-40-1019  
 )  
 Plaintiff, )  
 )  
 vs. ) **CONSENT SCHEDULING ORDER**  
 )  
 Isuzu, Inc. and Kathy Williams, )  
 )  
 Defendant. )  
 )

This matter is before this Court on joint motion of all active parties to enter into a Consent Scheduling Order in connection with the above-captioned action. It is therefore ORDERED that this action is subject to the following schedule:

1. Motions to join other parties and amend the pleadings shall be filed no later than April 10, 2006.
2. Plaintiff shall name each person whom Plaintiff expects to call as an expert at trial no later than February 2, 2007.
3. Defendant shall name each person whom it expects to call as an expert at trial no later than March 5, 2007.
4. Discovery shall be completed no later than July 2, 2007. All discovery requests shall be served such that the deadline for the service of a response is prior to this date.
5. All dispositive motions shall be filed no later than July 16, 2007.
6. This case shall not be called for trial before August 6, 2007.

IT IS SO ORDERED.

---

Presiding Judge  
Fifth Judicial Circuit

Columbia, South Carolina

\_\_\_\_\_, 2006

WE SO MOVE:

---

Deirdre McCool  
Peter T. Phillips  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
151 Meeting Street / Sixth Floor  
Post Office Box 1806 (29402)  
Charleston, SC 29401-2239  
(843) 853-5200

Attorneys for Isuzu Motors America, Inc.

WE SO MOVE:

---

William Gary White, III  
2009 Lincoln Street  
Columbia, SC 29201  
(803) 256-2116

Attorney for Plaintiffs